

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JUAN CARLOS INTERIANO, Individually, and JUAN	:	
CARLOS INTERIANO, as assignee of ALL-BORO	:	Case No.: 23-cv-00238-PKC-AYS
REHAB CONSTRUCTION CORP., ALL BORO	:	
GROUP, LLC, and ALL-BORO CONSTRUCTION	:	
GROUP, INC.,	:	
	:	DECLARATION OF
Plaintiffs,	:	GEORGE J. VOGRIN
	:	IN SUPPORT OF
-against-	:	MOTION TO BE
	:	RELIEVED AS
ARCH SPECIALTY INSURANCE COMPANY,	:	COUNSEL
	:	
Defendant.	:	
-----		X

GEORGE J. VOGRIN, ESQ. declares the following under penalty of perjury:

1. I am a partner with the law firm of Vogrin & Frimet, LLP, attorneys of record for Plaintiff Juan Carlos Interiano, Individually, ("Interiano") and Juan Carlos Interiano, as assignee of All-Boro Rehab Construction Corp. ("Plaintiff") in this action. As such, I am fully familiar with the pleadings, circumstances, and proceedings in the instant action.

2. This affirmation is submitted in support of Vogrin & Frimet, LLP's motion to be relieved as counsel.

3. Effective January 1, 2025, counsel of record for Plaintiff, George Vogrin, Esq., Michael Frimet, Esq., and Jamie Denenberg, Esq. anticipate joining a new law firm and will be conflicted from handling this matter.

4. Before oral argument on two letter motions before the Honorable Magistrate Judge Shields, Mr. Vogrin advised the Court of this upcoming conflict. *See* ECF docket: Scheduling Order re 37, dated December 5, 2024. Oral argument on the letter motions was not held due to the upcoming conflict.

5. Nicholas Goodman, Esq. of Nicholas Goodman & Associates, PLLC, has agreed to represent Plaintiff in this action.

6. Mr. Interiano signed a stipulation to substitute Mr. Goodman as counsel in this action. Attached hereto as **Exhibit A** is the stipulation to substitute counsel signed by Mr. Vogrin, Mr. Goodman and Mr. Interiano.

7. I spoke with counsel for Arch Specialty Insurance Company, Aaron Mandel, Esq. who advised that Arch will not oppose the instant motion.

In accordance with 28 U.S.C. § 1746 I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
December 19, 2024

Respectfully submitted,

**VOGRIN & FRIMET, LLP**

BY: 

George J. Vogrin  
*Attorneys for Plaintiffs*